

Case: 5:24-cv-00005-DCB-ASH

SOUTHERN DISTRICT OF MISSISSIPPI  
FILEDSOUTHERN DISTRICT OF MISSISSIPPI  
FILED

MAR 24 2025

MAY 15 2025

BY ARTHUR JOHNSTON  
DEPUTYBY ARTHUR JOHNSTON  
DEPUTYLandon Earl Thomas 108168  
South MS Correctional Facility  
P.O. Box 1419  
Leakesville, MS 39451

A) Explain how Defendant Sheriff Brumfield violated plaintiff's Constitutional rights, including the dates of the ~~Incident~~ <sup>Incidents</sup>;

- The eight Amendment forbids "Cruel and unusual punishment" It ~~was made to~~ has been interpreted to prohibit excessive force and Guard brutality as well as unsanitary, dangerous or overly restrictive conditions. It is also the source for my right to medical care while incarcerated at Pike County Jail. Also no access to a law library and denial of access to the courts. James Brumfield was the elected Sheriff ~~from my~~ at the time of my incarceration from March 3, 2022 - Feb 6, 2023, ~~and then at~~ ~~He~~ He is responsible for the day to day operations the procedures and policies as well as the oversee of Employees working at the Pike County Jail. Everything must go thru the Sheriff, Therefore he is responsible

B) State the dates when the Allegations of Plaintiff's Complaint occurred, including the date when he was assaulted By Defendant Young; and Excessive force was used without warrant.

- I was assaulted by herbert Young on or about Oct 2, 2022 at about 7:50 am (They sent a recording of the Assault to the grand jury.) It's on record.

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- c) State allegations of the policies, practices, or customs including dates, establishing that Pike County violated Plaintiff's constitutional rights concerning the conditions of the Pike County Jail.
- Pike County is Responsible for funding the Jail. The Pike County Jail is in Pike County, Ms. The conditions of the jail the maintenance up keeping. The lack of proper hygiene ~~toilet~~ Black mold, Rusted Air vents, dirty clogged Vents, exposed wires, no lights in the cells, cells that doors don't lock, over crowding, sleeping on floors in cells and out of cells, Poor inadequate food. ~~toilet~~ No Heat in the winter and little or no air during the summer. Little or no Exercise (recreational or yard calls) Poor accommodations for people with disabilities) Super Max isolation, from March 3, 2022 - Feb 6, 2023, and Oct 3, 2023 - Oct 4, 2024.

X Landon Thomas #108168  
 print name  
 X Landon Thomas #108168  
 signature